

## UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America  
v.**Daniel VALDEZ-RODIGUEZ (42)**  
**AKA: Jesus VALDEZ-CANCINO (40)**  
**Murguia, Zacatecas, Mexico**

Case No.

L-21-MJ-

*Defendant(s)*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 18, 2021 in the county of Webb in the  
Southern District of Texas, the defendant(s) violated:*Code Section*  
18 USC 1543*Offense Description*

Whoever willfully and knowingly uses, or attempts to use, or furnishes to another for use any such false, forged, counterfeited, mutilated, or altered passport or instrument purporting to be a passport, or any passport validly issued which has become void by the occurrence of any condition therein prescribed invalidating the same,

This criminal complaint is based on these facts:

On or about March 18, 2021, at approximately 12:33 am, defendant, Daniel VALDEZ-Rodriguez, a citizen and national of Mexico applied for admission into the United States at the Juarez/Lincoln Port of Entry in Laredo, Texas, as a passenger in a commercial bus. At time of inspection, defendant presented a counterfeit United States passport card and counterfeit State of Texas Identification card both bearing the name J.R., and photograph of the defendant to CBP Officer Kokou Bockor. Defendant claimed to be said person, a United States citizen, living in Dallas, Texas. Defendant was referred due to the documents appearing to be counterfeit. At secondary inspection, defendant stated his true name as Daniel VALDEZ-Rodriguez, a citizen & national of Mexico born in Murguia, Zacatecas, Mexico. Defendant admitted that he had knowledge that the documents that he presented were in fact counterfeit & that he had paid approximately \$3,000 U.S Dollars for said documents. CBP system queries revealed, that the defendant had a prior misdemeanor conviction in the U.S. District Court for the Southern District of Texas (5:10-PO-04946) and removal on or about September 10th, 2010. Facts are based on the defendant's sworn statement and records of Customs & Border Protection. The defendant was paroled into the United States & an Immigration hold has been placed.

☐ Continued on the attached sheet./s/ Cynthia C. O'Bryant  
*Complainant's signature*Cynthia C. O'Bryant, CBP Enforcement Officer  
*Printed name and title*

Sworn to before me and signed in my presence.

Date: March 22nd, 2021Judge's signatureCity and state: Laredo, TexasDiana Song Quiroga, U.S. Magistrate Judge  
*Printed name and title*